

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION

SELENA HOWARD; DARIOUS LEGGETT; and
ANTRINET LEGGETT

PLAINTIFFS

V.

CIVIL ACTION NO.: 2:19-cv-84-KS-MTP

FORREST COUNTY;
CHEY SUMRALL, individually and
In his official capacity; BLAKE BASS,
Individually and in his official capacity

DEFENDANTS

DEFENDANTS' DESIGNATION OF EXPERT WITNESS

Comes now Forrest County, Mississippi, Chey Sumrall and Blake Bass by and through counsel, and pursuant to the Case Management Order and in accordance with Rule 26(a) of the Federal Rules of Civil Procedure and Rule 26 of the Uniform Local Rules and files this, their Designation of Expert Witness as follows:

1. Steven D. Ashley, M.Sc., M.L.S., ARM/P, AFSS, INCI
Risk Management & Training for Criminal
Justice and Governmental Service
15 Cluster Court
Monroe, Michigan 48161
Tel. 517-548-2275
Steve@PoliceRisk.com

Mr. Ashley is an expert in the areas of risk management, law enforcement, criminal justice, security, and corrections risk management. The remainder of his qualifications are provided in his curriculum vitae, which is attached as *Exhibit A*. His fee schedule is attached hereto as *Exhibit B*. Mr. Ashley's opinions will be based on a reasonable degree of scientific probability, and he will base those opinions on the medical records, discovery documents, deposition transcripts, pleadings, and trial testimony in this case. He also



relies on his knowledge, years of training and education, and his practical experience in his field of expertise.

2. Mr. Ashley's deposition has not been taken in this case. However, in the event that his deposition is taken, Mr. Ashley's testimony in that deposition is incorporated herein by reference, along with any corrections made and exhibits attached thereto.

3. The subject matter on which Defendants' expert is expected to testify is the reasonableness of Deputy Blake Bass' use of a Taser stun gun on Mr. Leggett under the totality of the circumstances surrounding an encounter between Deputy Bass and Leggett on or about September 27, 2017.

4. Mr. Ashley is expected to offer opinions related to whether he agrees or disagrees with any opinions rendered by any expert in this action, including the opinions of Plaintiffs' expert(s), is expected to explain the basis of his disagreement with any such opinions from other experts. Mr. Ashley reserves the right to supplement his opinions as discovery in this cause develops, including the depositions of Turner and Deputy Herrington.

5. Defendants reserve the right to call as expert witnesses and/or elicit expert testimony from any and all witnesses and/or experts designated and/or listed and/or identified by Plaintiffs. Moreover, Defendants continue to reserve the right to call as expert witness's any and all witnesses allowed by the Federal Rules of Civil Procedure and/or the orders of this Court.

6. Defendants specifically reserve the right to supplement and amend their interrogatory responses with regard to the opinions of their expert witnesses pursuant to Rule 26(b)(4) of the Federal Rules of Civil Procedure.

DATE: January 17, 2020.

Respectfully submitted,

FORREST COUNTY, MISSISSIPPI

BY: 

One of Its Attorneys

WILLIAM R. ALLEN (MSB #100541)
CHRISTINA J. SMITH (MSB #105483)
Allen, Allen, Breeland & Allen, PLLC
214 Justice Street
P. O. Box 751
Brookhaven, MS 39602-0751
Tel. 601-833-4361
Fax 601-833-6647
Email: wallen@aabalegal.com
Email: csmith@aabalegal.com

CERTIFICATE

I, the undersigned of Allen, Allen, Breeland & Allen, PLLC, hereby certify that on this day I have this day mailed, postage prepaid, a true and correct copy of the above and foregoing Designation of Experts to:

Daniel M. Waide, Esq.
Johnson, Ratliff & Waide, PLLC
P.O. Box 17738
Hattiesburg, MS 39404
dwaide@jhrllaw.net
Attorney for Plaintiff

This the 17 day of January, 2020.


OF COUNSEL